

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CIVIL ACTION NO.
)	1:20-CR-00800
v.)	
)	
CHRISTOPHER KYLE JOHNSTON,)	
TRENT BROCKMEIER, and)	
CHRISTOPHER CASSERI,)	
)	
Defendants.)	

**NOTICE OF UNOPPOSED MOTION OF DEFENDANT JOHNSTON TO
MODIFY CONDITIONS OF RELEASE**

PLEASE TAKE NOTICE that Defendant Christopher Kyle Johnston, by and through undersigned counsel, moves before The Honorable Robert B. Kugler, U.S.D.J., for an Order modifying Mr. Johnston's conditions of release in order to permit Mr. Johnston and his family to travel to Georgia and North Carolina. Mr. Johnston relies on the enclosed brief in support of his motion.

Respectfully submitted, this 18th day of May, 2022.

s/ Scott R. Grubman

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CHRISTOPHER CASSERI,)
)
Defendants.)

**BRIEF OF DEFENDANT JOHNSTON IN SUPPORT OF HIS UNOPPOSED
MOTION TO MODIFY CONDITIONS OF RELEASE**

Defendant Christopher Kyle Johnston submits this brief in support of his motion to modify the conditions of his release in order to permit holiday travel. In support of this request, Mr. Johnston states as follows:

- Currently, pursuant to the Court's order dated September 17, 2020, Mr. Johnston's travel is limited to Louisiana, Georgia, and Alabama, as well as the District of New Jersey and the Eastern District of Pennsylvania.
- Mr. Johnston would like to travel to Atlanta, GA to meet with counsel and pick up daughter from camp located in Horse Shoe, NC.
- Mr. Johnston and his wife would also like to travel to Charlotte, NC in July to celebrate his son's birthday.

- The proposed dates of travel are June 22, 2022, through July 9, 2022.
- Undersigned counsel has conferred with both the United States Probation Office as well as the U.S. Attorney's Office, and neither office objects to this request.

A Proposed Order is attached as Exhibit A.

Respectfully submitted, this 18th day of May, 2022.

s/ Scott R. Grubman

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CERTIFICATE OF SERVICE AND COMPLIANCE

I hereby certify that the foregoing was prepared using Times New Roman, 14-point font and was filed via ECF, with a copy sent via email to the prosecutors:

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EXHIBIT A

**UNITED STATES DISTRICT COURT
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Plaintiff,)	CIVIL ACTION NO.
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v.)	
)	
CHRISTOPHER KYLE JOHNSTON,)	<u>PROPOSED ORDER</u>
TRENT BROCKMEIER, and)	
CHRISTOPHER CASSERI,)	
)	
Defendants.)	

This matter having come before the Court on the Unopposed Motion of Defendant Christopher Kyle Johnston to Modify Conditions of Release, it is hereby ORDERED as follows:

Mr. Johnston's conditions of release, Docket No. 4, are hereby modified to permit Mr. Johnston to travel to Atlanta, Georgia and Charlotte, North Carolina, between the dates of June 22, 2022, through July 9, 2022.

IT IS SO ORDERED

This _____ day of _____ 2022.

HONORABLE ROBERT B. KUGLER
UNITED STATES DISTRICT JUDGE